STIPULATION TO EXTEND DEADLINE Case No. 4:18-cv-05109-SMJ

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COMES NOW the parties and state as follows:

Plaintiff's counsel John P. Sheridan has been in trial since April 15, 2019. While the parties' counsel have diligently attempted to resolve all pending discovery disputes between them, they were unable to schedule a meet-and-confer call to address Defendant's responses to a number of Plaintiff's discovery requests until May 17, 2019, due to Plaintiff's counsel's trial commitments. The parties are continuing to attempt to resolve several discovery disputes discussed during today's call and hereby request that the Court extend the May 20, 2019 deadline for Plaintiff to file any motion to compel by seven calendar days. The parties jointly represent that good cause exists for this extension, which will further the interests of judicial economy.

DATED this 17th day of May, 2019.

The Sheridan Law Firm, P.S. Attorneys for Plaintiff

By s/ John P. Sheridan

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By s/Mark N. Bartlett

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PROOF OF SERVICE

I hereby certify that on the 17th day of May, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/ Mark N. Bartlett

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